

 <p>CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)</p> <p>This form should be used only by project participants and other stakeholders for submitting a “Letter to the Board” in accordance with the latest version of the <i>Modalities and procedures for direct communication with stakeholders</i></p>	
Name of the stakeholder ¹ submitting this form (individual/organization):	Grütter Consulting AG and CAF (Latin American Development Bank)
Address and contact details of the individual submitting this form:	Address: Thiersteinerstr 22, 4153 Reinach, Switzerland Telephone number: ++591 2214 83 11 E-mail address: jgruetter@gmail.com
Title/Subject (give a short title or specify the subject of your submission)	Usage of Latest Approved Methodology Versions for Transport Projects Registered with a Previous Methodology Version
Please mention whether the submitter of the form is:	<input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other stakeholder, please specify
Specify whether you want the letter to be treated as confidential ² :	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
Please choose any of the type(s) below ³ to describe the purpose of this submission.	
<input type="checkbox"/> Type I: <input type="checkbox"/> Request for clarification <input type="checkbox"/> Revision of existing rules <input type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference <input checked="" type="checkbox"/> Type II: Request for Introduction of new rules <input type="checkbox"/> Type III: Provision of information and suggestions on policy issues	
Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).	

¹ DNAs and DOEs shall use the respective DNA/DOE forms for communication with the Board.

² As per the applicable modalities and procedures, the Board may make its response publicly available.

³ Latest CDM regulatory documents and information are available at: <http://cdm.unfccc.int/Reference/index.html> .

The EB approved as of 25/11/2011 the Version 04 of the transport methodology AM0031 and the Version 03 of the transport methodology ACM0016. Both versions were approved after long discussions with the major objective of simplifying the projects especially concerning monitoring and thus reducing not only significantly costs but also reducing verification complexity and duration. This is unique concerning new methodology versions i.e. methodology revisions when concerning have been either changes or alternative approaches or more complex and detailed monitoring while the revisions of the transport methodologies initiated by the Methodology Panel of the UNFCCC have led to the conclusion that monitoring of concerned transport projects can be simplified considerably without reducing environmental integrity. The major simplifications of the new methodology versions include:

- The frequency for the passenger survey has been reduced from annual surveys to a survey in the years 1 and 4.
- The monitoring of leakage especially concerning the congestion and rebound effect has been simplified in terms of frequency or that parameter not being required if certain conditions are fulfilled.

These simplifications are very much appreciated and reduce transaction costs of these projects significantly. However already registered projects with previous versions cannot profit from these changes and have to continue investing lots of money for a monitoring frequency which is not required. First movers, instead of being awarded are thus in a disadvantage. While potentially these projects could request a change of the PDD this process takes around a year, requires a validation report from a DOE plus a decision from the EB. DOEs charge for this process around 30,000 Euro and during the process the monitoring as before needs to be continued. The situation that methodologies have simplified considerably monitoring is not common and therefore we suggest that the EB allows registered projects to use for monitoring the latest approved version.

Please provide any specific suggestions or further information which would address the issue raised in the previous section, including the exact reference source and version (if applicable).

To remedy this situation and to create fairness and homogeneity between new and registered projects we suggest that the EB publishes a decision note stating that already registered transport projects using a version prior 03 for ACM0016 and prior version 04 for AM0031 can adapt with immediate effect and without necessity of additional approval by the EB the monitoring procedure to the currently valid version of the same methodology. This would create fairness to already registered projects which have paved the way with their investments and data collection not only for the methodology reformulations realized by the UNFCCC but also in general for other transport projects.

If necessary, list attached files containing relevant information (if any)

- [replace this bracket with text, the field will expand automatically with size of text]

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat	29 May 2012
Reference number	2012-117-S

History of document

Version	Date	Nature of revision
---------	------	--------------------

01.2	08 February 2012	Editorial revision.
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
Decision Class: Regulatory Document Type: Form Business Function: Governance		